

Corporate Risk Register - Strategic Risks Quarterly Update

Report Author: Helen Belenger
Generated on: 25 February 2019



Risk Status	
	Alert
	High Risk
	Warning
	OK
	Unknown

Control Pending

Status	Risk No.	Risk Area	SLT Lead	Original Score	Previous 1/4ly Review Score	Current Score	Target Score	Target Date	Internal Controls
	CRR 88	Non Achievement of Recycling Target of 50% by 2020	Jane Dodsworth	6	4	2	3	01-Jan-2020	Improving
	CRR 147	Southern Gateway Regeneration	Paul Over	9	9	9	4	30-Jun-2019	Improving
	CRR 148	Local Plan	Andrew Frost	9	6	6	3	31-Jul-2020	Improving
	CRR 149	Impact of Welfare Reform, including Universal Credit (UC), on working claimants across the district	Louise Rudziak; Jane Dodsworth	9	6	6	3	31-Mar-2020	Improving
	CRR 165	Brexit	John Ward	6	6	6	4	30-May-2019	Improving

Controlled

Status	Risk No.	Risk Area	SLT Lead	Original Score	Previous 1/4ly Review Score	Current Score	Target Score	Target Date	Internal Controls
	CRR 01	Financial Resilience	John Ward	9	6	6	3	31-Mar-2020	Good
	CRR 08	Skills / Capability / Capacity	John Ward	3	3	3	2	31-Mar-2020	Good
	CRR 09	Business Continuity	John Ward	9	6	6	3	31-Mar-2020	Good
	CRR 68	Health and Safety	John Ward	9	4	4	4	31-Mar-2020	Good
	CRR 97	Cyber Risk Attack Across ICT Estate	John Ward	6	6	6	6	31-Mar-2020	Good

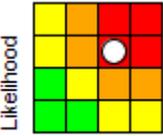
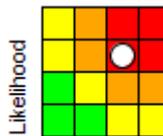
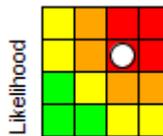
Appendix 1 (a)

Status	Risk No.	Risk Area	SLT Lead	Original Score	Previous 1/4ly Review Score	Current Score	Target Score	Target Date	Internal Controls
	CRR 145	Data Protection Act Breach - Loss of Data	John Ward	4	3	3	3	31-Mar-2020	Good

Management Control Pending

CRR 88	Non Achievement of Recycling Target of 50% by 2020		Management	Control Pending
			Corporate Links	
The current recycling target set for 2020 is 50%. The failure to achieve this target could mean the Council may incur significant fines, taxes or extra landfill taxes or reputational damage.				
SLT Risk Owner: Jane Dodsworth Responsible Officer: Kevin Carter				
Original and Target Risk Assessment				
Original Risk Date	28-Nov-2014		Target Risk Date	01-Jan-2020
Original Risk Score	6	Likelihood Impact	Target Risk Score	3
				Likelihood Impact
Current and Previous Quarter Risk Assessment				
Current Assessment Previous Quarter Assessment	25-Feb-2019			2
	20-Dec-2018			4
		Likelihood Impact		
Internal Controls				Current Status
Initiatives to increase amount of recycling	1. New initiatives to increase recycling rates are being implemented and further work to improve the quality of the waste for recycling collected are under consideration. 2. A Waste & Recycling Panel has been established to drive forward initiatives and improvements.			Improving
Latest Position Statement				
25 Feb 2019	The forecast County recycling rate exceeds 50%. CDC forecast is 47% and improving. The risk of any fines arising from not meeting 50%			

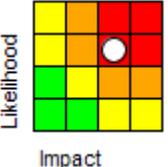
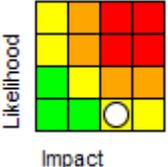
	has been significantly reduced both because of the County figure and BREXIT . While there may be a reputational risk by CDC specifically not meeting the 50% we are in the top 20 LA's across the UK in recycling improvement.
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CRR 147		Southern Gateway Regeneration		Management	Control Pending
				Corporate Links	
<p>Failure to deliver the outcomes of the project leading to reputational damage and financial exposure to CDC as lead partner, and potential repayment of the Local Enterprise Partnership (LEP) (and other funding). Lack of engagement or buy in by other key partners, leading to CDC being isolated and unable to deliver outcomes. Masterplan becomes commercially unviable due to certain market sectors' changes including demands for community/public realm use types.</p> <p>SLT Risk Owner: Paul Over / Jane Hotchkiss Responsible Officer: Victoria McKay</p>					
Original and Target Risk Assessment					
Original Risk Date	23-Feb-2018			Target Risk Date	30-Jun-2019
Original Risk Score	9			Target Risk Score	4
Current and Previous Quarter Risk Assessment					
Current Assessment Previous Quarter Assessment	22-Feb-2019			9	
	14-Jan-2019			9	
Internal Controls					Current Status
Partner Organisation Engagement	1. Law Courts - Homes England (HE) hand over. Close liaison with HE with contingency built into Masterplan. Use of EPH committee rooms completed. CDC has agreed 43 Fridays per annum. Courts completely closed on 21 December 2018. 2. WSCC and land held. On-going discussions with County Council. WSCC land not transferring to HE.				Improving

Appendix 1 (a)

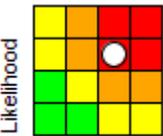
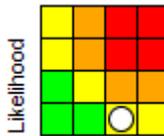
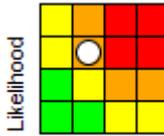
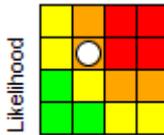
Strategic Land Owner Engagement	<ol style="list-style-type: none"> 1. Memorandum of Understanding (MOU) signed. 2. Growth Deal approved and Growth Board meeting held on 4 January 2019, and on-going liaison with other partners. 3. Relocation of Royal mail & Stage coach - suitable sites identified but St. James site released and Parkers site awaiting due diligence. 	Improving
Financial Controls & Budget Monitoring	<ol style="list-style-type: none"> 1. Identifying potential abnormal costs as early as possible by undertaking key studies in advance e.g. flooding, contamination and drainage. 2. Relocation funding from key partners - Timely reapplication to LEP/HE and exploring alternative funding routes as necessary. 	Improving
Management of External Consultants	<ol style="list-style-type: none"> 1. Contract T&C's for consultants employed to ensure delivery of service. 2. Availability of consultancy advice - Use tried and tested framework agreements to source expertise; test knowledge via tendering process. 	Good
Masterplan	<ol style="list-style-type: none"> 1. Demand in market sector changes - Regular updating of viability advice for the Masterplan as the project is implementation proceeds. 2. Road space configuration - WSCC Highways input to project team to ensure solution(s) are acceptable. 3. Community or Public Realm Uses for site - Steering group input and regular re-appraisal of the scheme as it progresses. 	Improving
Compulsory Purchase Order (CPO)	<ol style="list-style-type: none"> 1. Use of CPO if required for land acquisitions for Masterplan assembly, where unable to agree terms to complete acquisitions. 2. Use of consultancy support to ensure CPO grounds well founded, including independent valuations. 	Improving
Latest Position Statement		
25 Feb 2019	<p>Follow up Waste Water Treatment study completed but outstanding question on cost has been raised with the consultants.</p> <p>Slippage in the program and the impact, if any, on funding is regularly discussed with the LEP, lastly at a meeting on 11 January 2019. It is essential that the funding is spent by 31 March 2019 or it risks being lost. LEP have agreed to slippage of outcomes and for £500k flexibility funding to be carried forward to 2019-20. A report to Cabinet on 5 March is proposing ways to expend the LEP monies.</p> <p>Due to the delay in transferring the Police and Law Courts to Homes England the October 2018 date to go to the market has been missed. Work to identify and formalise the relocation sites for Stagecoach and the Royal Mail continues, although the St. James site was released to enable the refurbishment of the site to progress. The purchase of the Parkers site will be reported to March 2019 Cabinet for reconsideration. Negotiations between CDC, WSCC and Homes England are progressing. One element of the legal commission includes the drafting of the Collaboration Agreement that will provide more clarity/formality than that which exists in the MOU. The Collaboration Agreement is largely agreed except the "minimum land values" need to be agreed and inserted. Progress on this was made at the Project Team meeting on 28 January, and will be requested at the project team meeting on 27 February 2019.</p> <p>Transfers of the MoJ sites to HE are progressing but have not yet been completed - expected transfer dates of September 2018 and December 2018 respectively, have both been missed by HE. The latest position is that they do not expect this to complete until May</p>	

	<p>2019 Publicity material (including a dedicated website and email) has been produced and a video has been finalised. The Development Brief is agreed.</p> <p>No further public funding sources have been identified.</p> <p>Presentation to the Chichester Chamber took place to WSCC CLC (5.2.19) , and future presentations are planned for Roussillon Park Residents Association (3.4.19) and John Rennie Residents' Association (tbc) . The Dept. for International Trade has approved Gateway 2 and as a result SG will obtain international coverage of the opportunity via trade missions and at MIPM in Cannes (March 2019).</p>
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CRR 148	Local Plan	Management	Control Pending		
		Corporate Links			
<p>Failure to complete Local Plan Review and achieve an adopted Local Plan by 2020. This would mean that the Council would face challenge that it does not have an up to date Local Plan and the impact would be:</p> <ul style="list-style-type: none"> • Without an up to date Local Plan the presumption in favour of sustainable development would apply, assessed against the policies in the National Planning Policy Framework (ref: para 14). • 5 year housing land supply (HLS) would be assessed against the objectively assessed need (OAN) for housing rather than the housing requirement figure in the Local Plan, making it highly likely that it would not be possible to demonstrate a 5 year HLS. • Both 1. & 2. would result in a loss of control over the location and form of development with decisions being made through the application and appeal process, rather than in accordance with the development plan as it would be considered to be out of date. • With respect to the Local Plan Review, the 40% cap applied to the OAN growth for housing in the government’s draft methodology would not apply and the amount of housing to be provided for in the LPR would increase substantially requiring an increase in the amount of land to be allocated for development. • The ability to plan and coordinate development with the provision of infrastructure would be reduced with an unplanned approach to the location of new development. • The potential for government intervention to take plan-making decisions out of the control of the Council. • Damage to the reputation of the Council for failing to produce a plan to guide and control development in line with its statutory duties as Local Planning Authority. <p>SLT Risk Owner: Andrew Frost Responsible Officer: Mike Allgrove</p>					
Original and Target Risk Assessment					
Original Risk Date	07-Mar-2018		Target Risk Date	31-Jul-2020	
Original Risk Score	9		Target Risk Score	3	
Current and Previous Quarter Risk Assessment					

Current Assessment Previous Quarter Assessment	18-Feb-2019	<p>Likelihood</p> <p>Impact</p>	6
	13-Dec-2018	<p>Likelihood</p> <p>Impact</p>	6
Internal Controls			Current Status
Agreed Timetable for Plan Production	1. Statutory Local Development Scheme agreed by Council. Detailed project plan for evidence base and plan production prepared.		Good
Sufficient Staff Resources to achieve timetable	1. Additional posts created in team. 2. Recruitment incentive payment and premia payments agreed to recruit and retain staff.		Improving
Ensure evidence base provided to meet timetable	Detailed project plan prepared for evidence base.		Improving
Member agreement to contents of plan	1. Provision of information, debate and discussion through Member briefings, Development Plan and Infrastructure Panel and formal democratic decision making process through Cabinet and Council.		Improving
Public Consultation	1. Public consultation to ensure that the views of the community are taken in to account in the plan-making process. 2. Initial public consultation has taken place on issues and options. 3. Public consultation on the Local Plan Review: Preferred Approach is now underway. 4. There will be further public consultation on the plan and prior to examination. This will enable the Council to take in to account the views of all interested parties on the contents of the plan and outstanding matters can resolved through the public examination in to the soundness of the plan (to be conducted by a planning inspector appointed by the Secretary of State). The current status will reflect the stage of consultation reached.		Improving
Latest Position Statement			
22 Feb 2019	The Local Plan Review: Preferred Approach consultation concluded on the 7 February. At the current time the representations are still being analysed so it is difficult to determine whether the likelihood of failing to complete the Local Plan Review and achieve an adopted Local Plan by 2020 has increased at this point in time. Further work on the transport assessment is currently being procured and this will have implications for the timetable, as would potential further work to deal with some of the concerns expressed by Natural England. However, it will only be possible to determine whether the risk has increased when all representations have been fully analysed and a timetable for the		

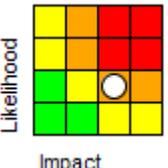
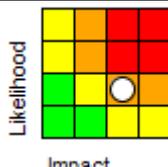
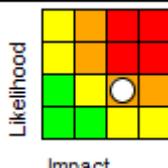
	work programme to deal with issues raised has been drafted.
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CRR 149	Impact of Universal Credit (UC) on working claimants across the district	Management	Control Pending		
		Corporate Links			
<p>Failure to provide appropriate support and guidance for claimants affected by the welfare reforms, including the rollout of Universal Credit (UC) on working age claimants across the district, resulting in the risk of rent arrears and the threat of homelessness. The benefits service currently administer in excess of 3,800 working age Housing Benefit claims. Full UC service in the district has been delayed until July 2018. The roll out will initially only affect new claims, although the majority will transition across over a period of 12-18 months.</p> <p>SLT Risk Owner: Louise Rudziak / Jane Dodsworth Responsible Officer: Linda Grange / Diane Kirkham</p>					
Original and Target Risk Assessment					
Original Risk Date	02-Mar-2018		Target Risk Date	31-Mar-2020	
Original Risk Score	9		Target Risk Score	3	
Current and Previous Quarter Risk Assessment					
Current Assessment Previous Quarter Assessment	20-Feb-2019				6
	24-Dec-2018				6
Internal Controls					Current Status
UC Focus Group	Initial meeting April 2017 identified the challenges our largest RP (Registered Provider) had experienced locally and nationally. Identified challenges that could reduce impact on claimants and prevent homelessness and agreed to: <ul style="list-style-type: none"> • support vulnerable claimants 				Poor

Appendix 1 (a)

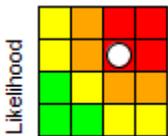
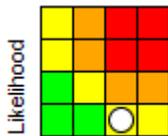
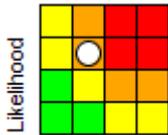
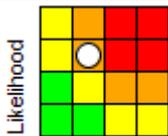
	<ul style="list-style-type: none"> • prepare claimants for the transition • assist claimants with their online UC claims • hold multi agency events to raise awareness • deliver pre and post tenancy workshops on money management • identify suitable venue and volunteers to run the workshops • identify resource requirements to deliver <p>Some mitigation has been put into place, for example, by contracting to CAB for debt advice and recruitment of Tenancy Sustainment Officers and a Housing Welfare Officer.</p>	
Nomination of a formal UC lead within the Housing Advice Team	In compliance with Homelessness Reduction Act s.179(2)(g) "The service must be designed to meet the needs of persons in the authority's district including, in particular, the needs of any other group that the authority identify as being at particular risk of homelessness in the authority's district." The Housing Advice Team have nominated a UC lead who will be responsible for coordinating advice to UC claimants that present seeking housing services assistance.	Improving
Register Provider eviction protocol	There is an intention to create a Register Provider eviction protocol so that the Council is warned in advance where there is a risk of homelessness, this will include tenants in receipt of UC, in arrears and where possession proceedings have been instigated. The lead officer conducting this piece of work has been briefed.	Improving
Increase number of units of Council owned temporary accommodation (TA).	On 31 October 2017 CDC purchased 22 Freelands Close. Three, 1 bed units were in use as TA (Temporary Accommodation) from December 2017 with a fourth unit due to be available in March 2018. The Council are considering options to redevelop the site and increase the number of units to a maximum of 12.	Good
Impact on services	<ul style="list-style-type: none"> • Benefit service will be impacted by transfer of WA claims to UC. Exceptions to UC, pensioner HB claims and CTR claims for WA and pensioners will continue to be administered. Revenues and Benefits Management team will continually review impact of rollout and resource requirements, as necessary. • From Jan 2019 persons in receipt of Sever Disability premium will continue to remain on legacy benefits until protection for this group of claimants can be legislated for. • Housing service may result in increased demand for services, as above, nominated UC lead officer to coordinate housing advice requirements 	Good

<p>Claimant support</p>	<ul style="list-style-type: none"> • Minimal funding received from DWP to assist claimants with submitting and managing their online UC claims • 6 kiosk style PC's located in main reception for claimants to use, any assistance to be provided by benefits staff • Minimal funding also received to provide PBS (personal budgeting support) cases would be referred from DWP. Currently engaging with CAB to provide this service as the rollout takes effect. • Publicity for claimant engagement to be arranged as soon as confirmation of roll out date received. • On 1 October 2018 the government announced that The Department for Work and Pensions (DWP) will fund Citizens Advice to provide Universal Support from April 2019. Chichester and Arun Citizens Advice Bureau (CAB) have been selected as a pilot to implement the service and in preparation have taken on the provision of both Assisted Digital Support (ADS) and Personal Budgeting Support (PBS) for all UC claimants from 1 November 2018. 	<p>Good</p>
<p>Revenues and Benefits staff awareness and training</p>	<ul style="list-style-type: none"> • DWP training for staff completed. • Internal staff training on-going as changes are disseminated from DWP. 	<p>Good</p>
<p>Latest Position Statement</p>		
<p>21 Feb 2019</p>	<p>Universal Credit rolled out with full live service across the District in July 2018, although managed migration to move people across from legacy benefits to UC has been delayed, new claims for UC are now being made. Consequently we expect to see a reduction in housing benefit caseload and an increase in the number of individuals and families in receipt of UC. As some people may experience delays in UC, be subject to sanctions or see a reduction in their overall household income as a consequence of UC, failure to support these individuals and families by either discretionary support, provision of budgeting advice and housing support may result in an increase in rent arrears and homelessness.</p> <p>Linda Grange has confirmed that Housing has nothing to add to this.</p>	

CRR 165		Brexit		Management	Control Pending
				Corporate Links	
The risks of Brexit and in particular of a "no deal" Brexit scenario and its impact on the council, its services and communities.					
SLT Risk Owner: John Ward					
Responsible Officer: Joe Mildred					
Original and Target Risk Assessment					
Original Risk Date	07-Sep-2018			Target Risk Date	30-May-2019
Original Risk Score	6			Target Risk Score	4
Current and Previous Quarter Risk Assessment					
Current Assessment Previous Quarter Assessment	13-Feb-2019			6	
	21-Dec-2018			6	
Internal Controls					Current Status
Impact Assessment	<p>Whilst the total impact of a no deal Brexit is still not fully understood, the government has started increasing its preparations and funding made available for the event of the scenario. There is potential for significant disruption to many established procedures and practices that enable everyday life in the UK. Whilst in the longer term new procedures and processes will be established, in the event of a no deal scenario the short term may cause several significant problems for businesses and the community. These may include areas such of a shortage of supplies, transportation difficulties, an impact on the labour force, a downturn in the economy and a potential run on the pound amongst others.</p> <p>Whilst the council is likely to still be able to perform most of its key functions effectively the impact on the local</p>				Improving

	<p>community and businesses will require the council to react to provide support accordingly. There could also be some additional duties and requirements given to the council by government to help issues such as border control. There may be an impact on how well the council can carry out its duties through established legislation and frameworks which are currently aligned to EU legislation.</p>	
<p>Latest Position Statement</p>		
<p>13 Feb 2019</p>	<p>Service managers have completed an initial impact assessment has been undertaken across the council to understand the possible impact on the authority directly as well as community impacts. Contingency plans are being developed by services to deal with short term disruption such as the potential for fuel shortages, disruption to supply chains etc.</p> <p>Developments continue to be monitored regularly by SLT, and plans will be adapted as more information becomes available.</p> <p>The government have announced a small amount of funding (yet to be confirmed) for councils to develop their plans, and preparedness.</p>	

Management Controlled

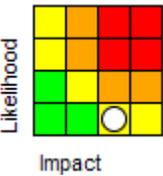
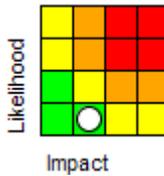
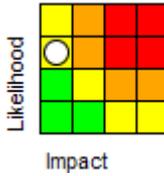
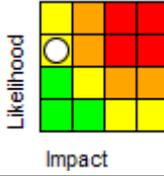
CRR 01	Financial Resilience	Management	Controlled		
		Corporate Links	Corporate Plan Priority - Use Resources Effectively and Efficiently.		
<p>Risk Description:</p> <ul style="list-style-type: none"> - Failure to maintain a robust and deliverable budget will lead to a lack of resources to fund services and council priorities, leading to reactionary decision making, and reputational consequences. - Failure to maximise efficient use of resources and so unsuccessful redirection of resources and not achieving objectives and outcomes of the council including deficit reduction plans. - Failure to maximise income streams. - Unpredictable Government policy (e.g. Brexit and localisation of business rates.) <p>SLT Risk Owner: John Ward Responsible Officer: Helen Belenger</p>					
Original and Target Risk Assessment					
Original Risk Date	31-Jul-2012		Target Risk Date	31-Mar-2020	
Original Risk Score	9		Target Risk Score	3	
Current and Previous Quarter Risk Assessment					
Current Assessment Previous Quarter Assessment	18-Feb-2019		6		
	10-Dec-2018		6		

Appendix 1 (a)

Internal Controls	Current Status	
Five Year Financial Model and Deficit Reduction Plan	<ol style="list-style-type: none"> 1. Monitor and update the 5 year financial model as required and review with CMT. 2. Assess against progress on Deficit Reduction Plan and savings targets. 3. Monitor income volatility in relation to use of New Homes Bonus (NHB) (Policy approved) and localisation of both Council Tax Reduction scheme (CTR) & business rates. 	Good
Income Streams	<ol style="list-style-type: none"> 1. Monitor income performance and review with SLT so remedial action can be taken. 2. Heads of Services and budget managers monitor income monthly from budget monitoring reports. 3. Service managers to assess fee setting for services in accordance with Fees & Charging Policy, and react when if income reductions occur. 4. Putting money in place to achieve better returns. 	Good
Reconciliation of Income	<ol style="list-style-type: none"> 1. Monthly reconciliations by services. 2. Non compliant services are identified by Internal Audit when service is reviewed as part of the Audit Plan. 3. Support given by Financial Services when setting up new income streams and reconciliation processes. 	Improving
Control of Expenditure	<ol style="list-style-type: none"> 1. Approval limits and routes for additional funding are detailed in the Council's Constitution and Financial Regulations. 2. Quarterly monitoring of major variances by SLT. 	Good
Financial Strategy Principles	<ol style="list-style-type: none"> 1. All key decisions of the Council should relate back to the Corporate Plan. 2. Ensure the revenue and capital programme remain balanced and sustainable over a rolling 5 year period. 3. Over the next 5 years maintain a position of non-dependency on reserves. 4. In order to maintain a balanced budget in a climate of no growth, savings in the revenue budget or external funding will need to be identified before any new revenue expenditure, including capital expenditure that has revenue consequences, is approved. 5. Review costs in response to changes in service demand. 6. Where the Council has discretion over charging for services, consideration needs to be given as to the extent to which service users should bear the costs, and the proportion met by Council Tax. 7. Continue to review the Council's costs in order to find further savings. 8. Match Council Tax increases to a realistic and affordable base budget. 9. Budgets should be pooled with other service providers to achieve more effective and cost efficient outcomes for the community. 10. New Homes Bonus (NHB) is a non ring-fenced grant from Government. Council policy has agreed in principle that this funding should be reserved to reward communities that have accepted growth. However, the allocation of this source of funding and its use must take into account that as this is not new funding; it can be used to protect services, and aid the council's legal requirement to set a balanced budget. The allocation of this funding will be reviewed annually during the budget setting process taking into account the financial settlement from Government. 11. Localisation of Business Rates. The decision to pool our business rates should be reviewed annually after receipt of government draft settlement to that the Council is in the best financial position. The Section 151 Officer 	Good

	continues to review the risks and opportunities that will emanate from the 100% localisation of business rates.	
Revenue and Capital Programme Principle	<p>1. Capital receipts, reserves and interest on investment will primarily be available for new investment of a non-recurring nature, thereby minimising the overall financial risk.</p> <p>2. Ensure that a sufficient level of reserves are maintained, as informed by the Financial Strategy, so that the Council can remain flexible and is able to respond to a changing local government environment.</p> <p>3. Borrowing could be used for capital schemes or "invest to save" projects providing the cost of servicing the debt is contained within the revenue savings/income the project generates. The payback period for invest to save projects should be shorter than the life of the asset.</p>	Good
Treasury Management	1. Generate better returns with the Treasury Management Strategy and the Investment Protocol and the Council's view of risk and increased diversity.	Good
Latest Position Statement		
22 Feb 2019	<p>The Council has secured Government funding certainty for 2019-20 when it accepted the 4 year settlement funding agreement available from 2016-17 onwards. The 2019-20 Budget and Council Tax setting will be considered by Council in March. The Council is part of the West Sussex Councils 75% Business Rates Retention Pool Pilot for 2019-20. This will retain an extra one off £21m to the pool for 2019-20.</p> <p>The Council uses its 5 year Financial Strategy Model to forecast its future budget requirements. Although due to the 2019 comprehensive spending review, the fair funding review for 2020-21 and the localisation of business rates there remains a lot of uncertainty surrounding future Government funding. The outcome of the reviews will not be known until December 2019 when the provisional settlement is announced. In the meantime all West Sussex council's have responded to the Government consultation on the Fair Funding Review and Business Rates Retention Scheme required in late February. Further consultation is expected over the coming months.</p> <p>There is further uncertainty in relation to Brexit and the impact this may have directly on council services or on the demand for its services in the coming financial year.</p> <p>During the year monitoring of the financial targets continues to be undertaken through the relevant programme boards, and the achievement of savings or increased income as part of the Council's Deficit Reduction Plan which underpins its ability to continue to set balanced budgets, whilst not relying on the New Homes Bonus (NHB) or any other temporary funding as well as forward fund an 25 year asset replacement programme.</p> <p>Parking income continues to be monitored on a monthly and quarterly basis to determine trends. Tariffs were reviewed and amended 1 April 2018, with an agreement to freeze charges until April 2020. Parking income is affected by changes in the use of cities and towns, with latest figures showing volume as being down but duration of stay having increased.</p> <p>Current in year revenue monitoring is forecasting an estimated underspend of £0.099m by March 2019, mainly due to reduced income from both car parks and planning fees. As this is a potential risk, provision for a reduction in income for future years was built into the Financial Strategy model considered by Cabinet at its December 2019 meeting and reflected in the income targets for the 2019-20 budget.</p> <p>Potential changes as a result of other funding partners, including WSCC, for service delivery and joint funding arrangements will need to be</p>	

	considered in future financial planning for 2020-21 and beyond. The risk score remains the same as the last review due to the continued uncertainty.
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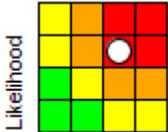
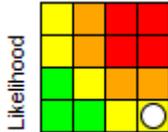
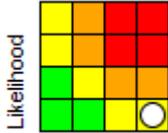
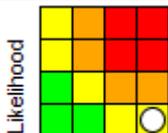
CRR 08	Skills / Capability / Capacity	Management	Controlled
		Corporate Links	Corporate Plan Priority - Use Resources Effectively and Efficiently.
Risk Description: Failure to have resilience in the staff structure, and so lack the right number of staff with the right skills to deliver services, along with unrealistic expectations of services, which could lead to service failure, reputational damage and potential litigation.			
SLT Risk Owner: John Ward. Responsible Officer: Joe Mildred / Tim Radcliffe.			
Original and Target Risk Assessment			
Original Risk Date	31-Jul-2012		Target Risk Date
Original Risk Score	3		Target Risk Score
			31-Mar-2020
			2
			
Current and Previous Quarter Risk Assessment			
Current Assessment Previous Quarter Assessment	19-Feb-2019		3
	19-Dec-2018		3
Internal Controls			Current Status
Workforce Development Plan	1. Ensure commissioning and objectives remain relevant and up to date. 2. Review personnel literature, marketing CDC as an employer at recruitment fairs. 3. CDC salaries - benchmarking exercise to be undertaken and monitored. 4. New apprenticeship Levy.		Good
Appraisal Process	1. Succession planning considered during appraisal process.		Good

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	<p>2. Completion of appraisals on time.</p> <p>3. Strategic training needs identified.</p>	
Training Plan and Budget	<p>1. Use First Line Managers course to develop new managers.</p> <p>2. Use management apprenticeship or diploma programmes to develop CDC managers.</p> <p>3. Specific training programme for new Directors and Divisional Managers.</p>	Good
Recruitment Benefits	<p>1. Use of benefits packages to aid recruitment: relocation package widely used, exceptionally assisted house purchase scheme.</p> <p>2. Guidance to be issued for how to use recruitment benefits.</p>	Good
Staff Satisfaction Survey	<p>1. Staff survey to be undertaken every two years, and action plans progressed.</p>	Improving
Strategic Leadership Team & Divisional Managers	<p>1. Specific training programme to newly appointed Divisional Managers to address core competencies, hosted by Portsmouth University.</p>	Good
Measuring Staff Turnover by Significant Groups	<p>1. SLT to review turnover statistics and the reasons quarterly.</p>	Good
Latest Position Statement		
21 Feb 2019	<p>Apprenticeship Levy came into effect 1.4.17 and several staff now undertaking levy funded courses. Workforce development initiatives are live.</p> <p>Corporate Pay Review now completed and is to be implemented in April 2019. This focuses on ensuring equal pay for equal tasks with some additional resource available for the new reward structure, with a focus on targeting this towards the levels where recruitment difficulties are apparent.</p> <p>Workforce planning including Divisional Manager's (DM) training programme at University of Portsmouth now complete. Increased use of premia payments for those areas with long term established recruitment issues and the use of the relocation package has aided recruitment for some service areas. Successful recruitment of CCS Divisional Manager & ICT Service Manager.</p> <p>Access to courses on Apprenticeship Levy has been of some concern although number of courses increasing and has been publicised to managers and uptake is increasing (up to 14 accessing the scheme by the end of 2018), requirement to release staff for 20% of time to study and pre-course requirements. HR monitoring take-up of courses and spend of Levy. Good links developed with both Chichester College and University, new ICT apprentice started.</p>	

CRR 09	Business Continuity	Management	Controlled		
		Corporate Links	Corporate Plan Priority - Use Resources Effectively and Efficiently.		
<p>Risk Description: Failure to react to an incident that would adversely affect the delivery of services, including leading to a breach of the council's statutory duties under the Civil Contingencies Act and result in both inability to service the community and reputational damage.</p> <p>SLT Risk Owner: John Ward. Responsible Officer: Helen Belenger/Warren Townsend.</p>					
Original and Target Risk Assessment					
Original Risk Date	31-Jul-2012		Target Risk Date	31-Mar-2020	
Original Risk Score	9		Target Risk Score	3	
Current and Previous Quarter Risk Assessment					
Current Assessment	22-Feb-2019		6		
	07-Dec-2018		6		
Internal Controls					Current Status
Robust BC Plans	<ol style="list-style-type: none"> 1. The Business Impact Assessment (B.I.A) is refreshed annually with SLT. 2. Critical services have Business Continuity (BC) plans covering the first 3 days of a business interruption. 3. The BC plans are tested every couple of years. 4. Retraining takes place where necessary, to embed BC into culture of the council. 5. BC plans and associated documents are stored on the council's x drive and off-site on external site (Resilience 				Good

	Direct). 6. Non critical services also have plans for over 3 days business interruptions. 7. Health checks take place of Plans in all service areas. 8. Effective backup of data.	
BC Management Strategy	1. Annual BCM corporate meetings held. 2. Key managers identified for BC plans. 3. Articles for team briefs or management forum to embed BC planning into organisation.	Good
Business Recovery Team	1. Training and repeated messaging to embed BC cultural into organisation. 2. Annual appraisals targets for Divisional Managers and relevant staff.	Good
Latest Position Statement		
22 Feb 2019	<p>Whilst the internal controls are good for business continuity, the risk score is always likely to continue to remain the same because the impact is serious and the likelihood is possible rather than unlikely. The main reason for this is the continuing cyber-attack threats that the organisation continue to get. We have good mitigation against cyber-attacks; however there remains a risk.</p> <p>Physical controls against loss of IT or building/s are good and would be 'unlikely' and less of a risk.</p> <p>Off-site replication of IT systems is currently the subject of a PID was approved by Cabinet and Council on 5 March 2019. The Corp. H&S team have undertaken an exercise as part of the PID to identify the systems that each division relies on (deemed critical) and how quickly they need the systems to be restored and whether they need 100% of the systems. This has enabled IT to scope what equipment and systems would be needed off site. There are options where a percentage of staff could be given access to systems in the first few days of an interruption whilst the accessibility is gradually increased. The risk score would very likely be reduced if cloud storage and a server back-up were to be implemented. The BIA (Business Impact Assessment) has been refreshed in the recent annual H&S meeting with SLT.</p> <p>The health of BC plans, the BIA and processes remains strong; a BC exercise was undertaken on 12th February and involved all of SLT and some members of CMT. The exercise went extremely well and a small action plan was drawn-up – all actions are expected to be complete by 15th March 2019.</p>	

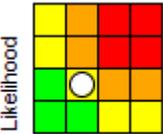
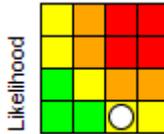
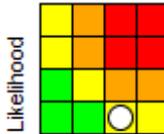
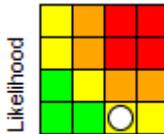
CRR 68	Health and Safety	Management	Controlled		
		Corporate Links	Corporate Plan Priority - Use Resources Effectively and Efficiently.		
Risk Description: Failure to adhere to H&S policies and procedures leading to death or serious injury of an employee or third party resulting in prosecution under H&S legislation, adverse publicity, fines and possible prison sentences. Such failures may also lead to civil claims for compensation					
SLT Risk Owner: John Ward.					
Responsible Officer: Helen Belenger/Warren Townsend.					
Original and Target Risk Assessment					
Original Risk Date	03-Sep-2013		Target Risk Date	31-Mar-2020	
Original Risk Score	9		Target Risk Score	4	
Current and Previous Quarter Risk Assessment					
Current Assessment Previous Quarter Assessment	22-Feb-2019		4		
	07-Dec-2018		4		
Internal Controls					Current Status
H&S policies & procedures	Clear health and safety policies, procedures and guidance are available to all staff and members via intranet and in hard copy format at some sites including: 1. Statement of intent. 2. Hierarchy for communication/organisation. 3. Roles and responsibilities. 4. H&S arrangements.				Good

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	<ul style="list-style-type: none"> 5. Policies, procedures and guidance for specific H&S issues e.g. control of contractors, COSHH assessments forms etc. 6. An extensive range of evidence compliance forms. 7. Specific risk assessments for site visits undertaken for staff and member visits. 8. Quarterly updates to Cabinet member for Corporate Services by the H&S Manager. 	
Training Programme & Competencies	<ul style="list-style-type: none"> 1. Specific training programmes for all aspects of H&S skills and competencies required with the Council's business. 2. Staff names with relevant competencies and holding key responsibilities available on staff intranet. 3. Training records maintained to evidence training provided. 4. Training for all new members as part of the Members' Induction Programme. 	Good
Legionella Testing	<ul style="list-style-type: none"> 1. Written policy available. 2. Regular testing and monitoring to demonstrate compliance. 3. Staff involved in legionella management or may be exposed to legionella risk are provided with training. 	Good
Quarterly service meetings for high risk service areas	<ul style="list-style-type: none"> 1. CCS - Quarterly insurance & H&S meetings with the Director of Residents' Services & the Contract Services Divisional Manager with the Financial Services Divisional Manager, insurance officer, H&S Corporate Manager & CCS Technical Supervisor. To assess accident trends and claims and agree any actions required to staff duties, policies and procedures. 2. Culture & Place - Quarterly insurance & H&S meetings with Director of Growth & Place Services and the Divisional Service Managers for the museum, Westgate Leisure contract, and car park service, to discuss claims & accidents to identify any necessary changes to procedures/policies etc. 3. All accidents, near misses and reports of ill health are investigated by the Corporate H&S team. Interventions made with the service where appropriate to improve systems of work to prevent reoccurrence. 	Good
PAT testing	<ul style="list-style-type: none"> 1. Annual testing of all electrical equipment carried out by qualified contractor. 	Good
Safety Committee	<ul style="list-style-type: none"> 1. A group of managers and employees meet 3 times a year to discuss health and safety issues and matters of interest. CCS and car parks have local 'Safety Forums', meeting bi-monthly, that feed into this committee. The Safety Committee reports any issues of significance to the JECP. 	Good
Caution Alert Register (CAR)	<ul style="list-style-type: none"> 1. Specific procedures and decision tree guidance in place for staff and members to follow on staff intranet. 2. Nominated person CR Keeper who maintains register and advises staff. 3. Procedures in place for appropriate staff and members to access CAR. 4. Compliance with data protection legislation included in policies and procedures. 5. Violence & aggression response team available to support staff and members at EPH if an incident occurs. 6. Two levels of Violence & Aggression (V&A) resolution training provided to relevant staff. 	Good
Emergency arrangements for Council Premises	<ul style="list-style-type: none"> 1. Evacuation procedures in place for EPH on staff intranet. 2. Known competent staff with allocated roles & responsibilities for evacuation procedures. 3. Regular testing of evacuation procedures carried out. 4. Policy advising the arrangements in place for safe evacuation of council owned buildings. 	Good
Corporate H&S Audits &	<ul style="list-style-type: none"> 1. Programme of H&S audits of service areas, improvements and observations which are fed back to Service, H&S 	Good

Appendix 1 (a)

Action Plans for Service H&S Improvement	and management with any necessary improvement action plans. Progress with recommendations made are reviewed after an agreed period. 2. In addition, there is a programme of audits in place for the SLM leisure centres contract. This involves checking H&S performance and compliance in key identified areas.	
Contract Management	1. Every major contract should have an identified contract manager who is responsible for ensuring the delivery of the contract in accordance with specification. 2. The contractor manager must ensure that their contractor adheres to H&S legislation in carrying out the specification and has a monitoring system in place which is also including performance reporting to the council's contract manager. 3. Upon request the H&S manager will attend regular quarterly/annual meetings for the council's specific high risk activity contracts along with the contract manager, to liaise with the contractors regarding any H&S concerns. 4. Members are involved in major decisions on procurement matters.	Good
Fire Safety of all Council Owned Premises	<ul style="list-style-type: none"> • Fire Risk Management Group – Quarterly meetings held to develop and monitor action plans following fire assessments results with the Directors of Corporate Services, Housing & Communities, and Growth & Place Services plus other relevant council officers. • Activity-based Fire Risk Assessments of all premises have been undertaken. Following the Grenfell fire we have used a fire engineer to carry out structural Fire Risk Assessments to check the horizontal and vertical fire compartmentation. A number of remedial works were identified and are currently being undertaken by the Building Services team based on risk. 	Improving
Latest Position Statement		
22 Feb 2019	<p>The consequences of a serious accident or incident at work have the potential to be 'major', i.e. death of a member of staff, contractor or member of the public. Therefore the severity in the risk score is always going to be high.</p> <p>However, due to the operation of an effective H&S management system there are good controls in place to reduce the likelihood of such an incident. Despite having good systems and procedures in place, CCS remains the highest risk operation within the Council due to the nature of the work.</p> <p>H&S compliance of CDC's biggest service contractor, Everyone Active, is monitored through a programme of audits carried out by the Corp. H&S team on an annual basis. The first year of audits generally found Everyone Active to be performing well in relation to health and safety with mainly minor issues being raised.</p> <p>The initial findings of the Grenfell fire provided opportunity for further checks on fire safety management to be considered. This prompted a fire safety focus group to be set up to check for any weaknesses in CDC's fire safety management. The focus group is represented across all service areas which highlighted some new areas for consideration in respect to CDC's responsibilities for fire safety management. A number of improvements have been made to areas of potential weakness. There remains a very small number of lower risk fire safety works to some estates properties. This is due to complications with other building-related defects that need sorting before the fire safety works can begin.</p>	

CRR 145		Data Protection Act Breach - Loss of Data		Management	Controlled
				Corporate Links	
Failure to keep all personal data secure leading to a breach of the General Data Protection Regulations (GDPR) and Data Protection Act, resulting in fines and reputational risk.					
SLT Risk Owner: John Ward Responsible Officer: Nick Bennett					
Original and Target Risk Assessment					
Original Risk Date	16-Mar-2017		Target Risk Date	31-Mar-2020	
Original Risk Score	4		Target Risk Score	3	
Current and Previous Quarter Risk Assessment					
Current Assessment Previous Quarter Assessment	18-Feb-2019		3		
	13-Dec-2018		3		
Internal Controls					Current Status
Data protection Officer	Divisional Manager of Democratic Services is the designated Data Protection Officer providing advice to officers, advising on safe sharing of data between agencies, overseeing data subject access requests and liaison with Information Commissioners Office in the event of customer complaint or security breach.				Good
Protocols and Policy in place	Data Protection Policy is in place to provide advice and guidance for staff and customers. Internal protocols and processes are in place to manage/limit risk of data loss. Updating processes to comply with new guidance under GDPR is underway.				Good

Appendix 1 (a)

Staff Training	Data Protection training is provided to all new staff and Members. Staff online training is available to allow staff to refresh their knowledge. Specific GDPR module for all staff is in place, manager training day has been held.	Good
Data backed up	All electronic data is backed up daily and securely stored off-site.	Good
Secure devices	All staff laptops are encrypted to secure data. All mobile phones are provided with secure application to protect data. Dual authentication in place for remote access to data.	Good
PSN Compliance	The authority is taking steps to meet new certification requirements in accordance with the updated requirements of the Public Services Network requirements for provision of a secure network.	Good
Safe transfer of personal data	Personal and sensitive data shared with other government agencies is transferred via GCSX secure email accounts. A review of processing has been completed as part of GDPR approach.	Good
Safe destruction of confidential documents	All hard copies of confidential papers are shredded prior to disposal.	Good
Latest Position Statement		
22 Feb 2019	A new post has been created in legal and the new officer has undertaken initial training in GDPR and data management with a view to building resilience and skill sets in the organisation. With the new officer in post a review of all policies will be undertaken over the next 12 months. A register of Data Protection Officer decisions is now in place and all significant matters are recorded there. The Register of Processing is being updated. The Data Protection Officer has joined a new DPO group for West and East Sussex to build awareness of local best practice. New Controls - The new Data Breach process has been introduced to managers and successfully used by several departments and experiences support the view that the organisation has properly absorbed the benefits of GDPR into its data management.	